

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ROUMANN CONSULTING INC. and
RONALD ROUSSE,

Plaintiffs,

Case No. 18-CV-1551

v.

SYMBIONT CONSTRUCTION, INC.,
SYMBIONT HOLDING COMPANY, INC.,
SYMBIONT SCIENCE, ENGINEERING AND CONSTRUCTION, INC.,
THOMAS C. BACHMAN,
SONYA K. SIMON, ESQ.,
EDWARD T. MANNING, JR. and
TIMOTHY P. NELSON,

Defendants.

**PLAINTIFF ROUMANN CONSULTING INC.'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Plaintiff Roumann Consulting Inc., by its attorneys Halloin Law Group, S.C., moves this Court pursuant to Federal Rules of Civil Procedure 7(b) and 56, and Civil Local Rules 7 and 56(b)(1), for summary judgment on the fourth and seventh causes of action asserted in its complaint. The fourth cause of action is for a “declaration of misuse of confidential information / request for injunction” and the seventh cause of action is for “conversion of confidential information.” (DN 1, ¶¶ 122–32, 153–61.)

The grounds for this motion are more fully set forth in the documents listed below:

1. Plaintiff Roumann Consulting Inc.'s Memorandum in Support of Its Motion for Partial Summary Judgment;
2. Plaintiff Roumann Consulting Inc.'s Statement of Proposed Findings of Fact In Support of Its Motion for Partial Summary Judgment; and
3. Declaration of Ronald Rouse in Support of Plaintiff's Motion for Partial Summary Judgment;
4. Declaration of Keith Winningham in Support of Plaintiff's Motion for Partial Summary Judgment;
5. Declaration of Brian Binkowski in Support of Plaintiff's Motion for Partial Summary Judgment; and
6. Declaration of Scott R. Halloin in Support of Plaintiff's Motion for Partial Summary Judgment.

Dated March 18, 2022.

HALLOIN LAW GROUP, S.C.
Attorneys for Plaintiffs Roumann
Consulting Inc. and Ronald Rouse

s/ Scott R. Halloin

Scott R. Halloin
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